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| PGRR Number | [128](https://www.ercot.com/mktrules/issues/PGRR128#summary) | PGRR Title | Regional Transmission Plan Review of Grid Enhancing Technologies |

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| Date | October 1, 2025 |

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| Submitter’s Information |
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| Market Segment | Not applicable |

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| Comments |

ERCOT submits the following comments to Planning Guide Revision Request (PGRR) 128.

ERCOT does not support the proposal to require ERCOT to evaluate grid enhancing technologies and advanced conductors in the Regional Transmission Plan (RTP). Even without such a requirement though, the current ERCOT Regional Planning Group (RPG) process has the flexibility to consider grid enhancing technologies or advanced conductors in transmission project evaluation.

The ERCOT Region has long been using the RTP and RPG processes to ensure the thorough vetting of various aspects of transmission project development. The RTP process serves the purpose of identifying reliability needs and providing potential solutions through ERCOT’s collaboration with Transmission Service Providers (TSPs). The TSPs then refine the projects identified in the RTP process and submit them for RPG review. This process allows the TSPs to use their expertise to refine the projects and select the appropriate and feasible technology to address a specific system need. In addition, the RPG comment process is designed to allow stakeholder comment, including any specific technologies the commenters deem as appropriate for a project, for any project submitted to RPG.

Requiring ERCOT to evaluate the potential use of grid enhancing technologies and advanced conductors in the RTP not only is impractical but also may not be meaningful for the following reasons:

1. Unlike utilities, ERCOT is not equipped with the expertise to determine the “availability, technical feasibility, repairability, durability, operational risks, … of grid enhancing technologies and high-performance conductors” as would be required by PGRR128. Nor is ERCOT equipped with the expertise to evaluate the use of grid enhancing technologies or high-performance conductors for the purpose of “increasing reliability of electric services”, “increasing safety of transmission system crossing over water”, or “reducing the risk of wildfires.” The ERCOT transmission planning process has been technology neutral and has relied on entities with the right expertise and resources to make sound decisions on the specific technologies used by a specific project.
2. Because ERCOT is not equipped with the expertise to determine the parameters and the feasibility of the grid enhancing technologies and high-performance conductors, any work coming out of the RTP process with the use of those technologies may not be helpful to provide meaningful guidance on future transmission solutions.
3. The broad scope and blanket nature of the proposal introduced by PGRR128 raises compliance concerns for ERCOT given that it is not possible for ERCOT to know each available grid enhancing technology and high-performance conductor.
4. RTP is a comprehensive assessment with a broad scope and tight timeline (one year) to meet the requirements from the North American Electric Reliability Corporation (NERC) Reliability Standards, ERCOT Protocols, and Planning Guide. In the 2024 RTP, 274 transmission solutions were determined to be needed to address the reliability needs identified. If the requirements proposed by PGRR128 were implemented, the project evaluation time needed for RTP develop would increase many fold.

ERCOT believes that the current RPG process allows for the consideration of grid enhancing technologies and high-performance conductors if TSPs or commenters believe appropriate and there is no need to introduce a new requirement in the RTP process that is impractical and likely not productive.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None